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14 *Attorneys for Plaintiffs*

15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ARIZONA

17 In Re Bard IVC Filters Products Liability
18 Litigation

19 No. MD-15-02641-PHX-DGC

20 **PLAINTIFFS' UNOPPOSED
MOTION TO SEAL**

21 Plaintiffs move this Court for an Order pursuant to the Stipulated Protective Order
22 (Doc. 268), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, sealing
certain documents accompanying Plaintiffs' Response to Bard's Motion for Protective Order
Regarding Discovery of Litigation Consultant's Report ("Response"). The exhibits that are
the subject of this Motion to Seal are alleged by Bard to constitute trade secrets or other
confidential research, development, or commercial information and have been designated by
Bard as such pursuant to the Stipulated Protective Order, thereby warranting protection from
public disclosure for discovery related motion.

1 Plaintiffs are seeking leave to file these documents under seal based on Bard's
2 designation of them as confidential pursuant to the Stipulated Protective Order; Plaintiffs
3 explicitly reserve their rights to challenge the confidentiality designations of the documents at
4 a later time, pursuant to the terms in the Stipulated Protective Order. Based on Bard's
5 designation of the documents as confidential, Plaintiffs may only submit them to this Court
6 under seal. Bard does not oppose this Motion.

7 The documents that are the subject of this Motion are described in Exhibit A.

8 This request is in line with this Court's prior Order (Doc. 318) Granting Bard's Motion
9 for Protective Order (Doc. 307) for the filing of related documents for purposes of briefing
10 the Lehmann issue.

11 For the foregoing reasons, and in order that Plaintiffs can fully respond to Bard's
12 Motion for Protective Order while complying with the terms of various protective orders, the
13 Court should grant Plaintiffs' Unopposed Motion to Seal.

14 RESPECTFULLY SUBMITTED this 17th day of December, 2015.

15 GALLAGHER & KENNEDY, P.A.

16 By: /s/Robert W. Boatman

17 Robert W. Boatman

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1 I hereby certify that on this 17th day of December, 2015, I electronically transmitted
2 the attached document to the Clerk's Office using the CM/ECF System for filing and
3 transmittal of a Notice of Electronic Filing.

4 /s/Mary E. Torrez

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